

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

GT Real Estate Holdings, LLC,

Debtor.¹

)
) Chapter 11
)
) Case No. 22-10505 (KBO)
)
)
)
)

**NOTICE OF (I) FILING OF BANKRUPTCY PETITION AND RELATED
DOCUMENTS AND (II) AGENDA FOR REMOTE HEARING ON FIRST DAY
MOTIONS SCHEDULED FOR JUNE 6, 2022 AT 10:30 A.M. (ET), BEFORE THE
HONORABLE KAREN B. OWENS AT THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE²**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE. COURTCALL WILL
NOT BE USED TO DIAL IN.**

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

https://debuscourts.zoomgov.com/meeting/register/vJIsf-CqqDgiHZv_uqZ-zhsvQ_VMBN6d9R4

**PLEASE NOTE: THE COURT REQUESTS THAT ALL PARTIES REGISTER WITH
ZOOM NO LATER THAN MONDAY, JUNE 6, 2022 AT 8:30 A.M. (ET).**

ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL CONTAINING
PERSONAL LOG-IN INFORMATION FOR THE HEARING.

PLEASE TAKE NOTICE that, on June 1, 2022, the debtor and debtor in possession in the above-captioned case (the “*Debtor*”) filed the following voluntary petition (the “*Petition*”) for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “*Bankruptcy Code*”), and related pleadings with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtor continues to operate its business as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

¹ The Debtor and the last four digits of its taxpayer identification number are: GT Real Estate Holdings, LLC (9589). The location of the Debtor’s principal office is 800 South Mint Street, Charlotte, NC 28202.

² All motions and other pleadings referenced herein are available online at <https://cases.ra.kroll.com/GTRE> or by request to the Debtor’s proposed counsel, Farnan LLP, Attn: Michael J. Farnan, (302) 777-0300 or mfarnan@farnanlaw.com.

A. VOLUNTARY PETITION

1. Voluntary Petition

A. GT Real Estate Holdings, LLC [[D.I. 1](#)] (Date Filed: June 1, 2022)

2. DECLARATIONS IN SUPPORT OF FIRST DAY PLEADINGS

2. Declaration of Jonathan Hickman, Chief Restructuring Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [[D.I. 8](#)] (Date Filed: June 2, 2022)

3. Declaration of Jonathan Hickman, Chief Restructuring Officer of the Debtor, in Support of Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[D.I. 10](#)] (Date Filed: June 2, 2022)

PLEASE TAKE FURTHER NOTICE that, a remote hearing with respect to the following first day motions (collectively, the “*First Day Motions*”) is scheduled for **June 6, 2022 at 10:30 a.m. (ET)** (the “*First Day Hearing*”) before The Honorable Karen B. Owens, United States Bankruptcy Judge for the District of Delaware.

C. FIRST DAY MOTIONS GOING FORWARD

4. Debtor's Motion for Order (I) Authorizing Continued Maintenance and Use of Prepetition Bank Account; (II) Authorizing Continued Use of Existing Checks and Other Business Forms; (III) Waiving the Deposit and Investment Requirement of 11 U.S.C. § 345(b); and (IV) Granting Related Relief [[D.I. 3](#)] (Date Filed: June 2, 2022)

5. Debtor's Motion for Interim and Final Orders (I) Approving Debtor's Proposed Form of Adequate Assurance of Payment to Utility Providers; (II) Establishing Procedures for Resolving Objections by Utility Providers; (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, and (IV) Granting Related Relief [[D.I. 4](#)] (Date Filed: June 2, 2022)

6. Debtor's Application for Order Appointing Kroll Restructuring Administration LLC as Claims and Noticing Agent, Effective as of the Petition Date [[D.I. 5](#)] (Date Filed: June 2, 2022)

7. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[D.I. 9](#)] (Date Filed: June 2, 2022)

8. Debtor's Motion for Interim and Final Orders (I) Authorizing Debtor to (A) Maintain Existing Insurance Policies, (B) Pay All of the Debtor's Insurance Obligations, and (C)

Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies;
and (II) Granting Related Relief [D.I. 11] (Date Filed: June 2, 2022)

PLEASE TAKE FURTHER NOTICE that parties who wish to participate in the First Day Hearing may do so by using the following link to register through Zoom:

https://debuscourts.zoomgov.com/meeting/register/vJIsf-CqqDgjHZv_uqZ-zhsvQ_VMBN6d9R4

After registering your appearance with Zoom, you will receive email confirmation containing information about joining the hearing.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

[Signature page follows]

Dated: June 3, 2022

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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*Proposed Counsel to the Debtor and
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